

**ATTACHMENT 1**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

|                   |   |  |
|-------------------|---|--|
|                   | ) | CASE NO.                                   |
|                   | ) |  |
| <b>Plaintiff,</b> | ) | <b>JUDGE JAMS S. GWIN</b>                  |
|                   | ) |  |
| <b>vs.</b>        | ) | <b>REPORT OF PARTIES'</b>                  |
|                   | ) | <b>PLANNING MEETING UNDER</b>              |
|                   | ) | <b>FED. R. CIV. P. 26(f) AND</b>           |
| <b>Defendant.</b> | ) | <b>LR 16.3(b) and 23.1)</b>                |
|                   | ) | <b>(For Use in Putative Class Actions)</b> |

1) Pursuant to Fed. R. Civ. P. 26(f) and LR 16.3(b) and 23.1, a meeting was held on

\_\_\_\_\_, 20\_\_\_\_, and was attend by:

\_\_\_\_\_ Counsel for plaintiff(s)\_\_\_\_\_

\_\_\_\_\_ Counsel for plaintiff(s)\_\_\_\_\_

\_\_\_\_\_ Counsel for defendants(s)\_\_\_\_\_

\_\_\_\_\_ Counsel for defendant(s)\_\_\_\_\_

2) The following motions are pending:

\_\_\_ Motion to Dismiss (Dates filed\_\_\_\_; Opposed\_\_\_\_; Reply\_\_\_\_)

\_\_\_ Motion to Remand (Dates filed\_\_\_\_; Opposed\_\_\_\_; Reply\_\_\_\_)

\_\_\_ Other: \_\_\_\_\_

3) The parties:

\_\_\_ have exchanged the pre-discovery disclosures required by Rule 26(a)(1);  
\_\_\_ will exchange such disclosures by \_\_\_\_\_, 20\_\_;  
\_\_\_ object that initial disclosures are not appropriate in this action.

4) The parties recommend the following track:

\_\_\_Expedited      \_\_\_Standard      \_\_\_Complex      \_\_\_Mass Tort

5) This case is suitable for one or more of the following Alternative Dispute Resolution (“ADR”) mechanisms:

\_\_\_Early Neutral Evaluation      \_\_\_Mediation      \_\_\_Arbitration  
\_\_\_Summary Jury Trial      \_\_\_Summary Bench Trial  
\_\_\_Case Not Suitable for ADR

6) Recommended cut-off date for amending the pleadings (including proposed class definition) and/or adding additional parties:\_\_\_\_\_

7) The parties \_\_\_do/\_\_\_do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 29 U.S.C. §636(c).

8) Recommended Case Management Plan:

The parties recommend:

- \_\_\_ Discovery on issues related to remand be completed by \_\_\_\_\_
- \_\_\_ Plaintiff(s) Response Brief due: \_\_\_\_\_
- \_\_\_ Defendant(s) Reply Brief due: \_\_\_\_\_
- \_\_\_ Discovery relevant to appropriateness of certification of the proposed class be completed by: \_\_\_\_\_, including:
  - plaintiff(s) deposition by: \_\_\_\_\_
  - defendant(s) 30(b) depositions by: \_\_\_\_\_
  - plaintiff(s) expert reports by: \_\_\_\_\_
  - defendant(s) expert reports by: \_\_\_\_\_
  - expert depositions by: \_\_\_\_\_
- \_\_\_ Plaintiff(s) motion for class certification to be filed by: \_\_\_\_\_
- \_\_\_ Defendant(s) opposition to motion for class certification to be filed by: \_\_\_\_\_
- \_\_\_ *Daubert* hearing date, if any: \_\_\_\_\_
- \_\_\_ Class certification hearing date: \_\_\_\_\_

9) Recommended dispositive motion date, if any: \_\_\_\_\_

10) Recommended date for Status Hearing: \_\_\_\_\_

11) Other matters for the attention of the Court: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_  
Attorney for Plaintiff(s)

\_\_\_\_\_  
Attorney for Plaintiff(s)

\_\_\_\_\_  
Attorney for Defendant(s)

\_\_\_\_\_  
Attorney for Defendant(s)